

- UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

caused by the repetitive, traumatic sub-concussive and concussive impacts the Plaintiff sustained during NFL games and practices. On information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

6. Plaintiffs claim damages as a result of:

_____x_____ Injury to Himself

_____x_____ Economic Loss

_____x_____ Loss of services

DEFENDANTS

7. Plaintiff brings this case against the following Defendant in this action:

_____x_____ National Football League

_____x_____ NFL Properties, LLC

8. Plaintiff played in the National Football League for the following teams:

Detroit Lions, Atlanta Falcons, Miami Dolphins, and Chicago Bears.

CAUSES OF ACTION

9. Plaintiff herein adopts by reference the following Counts of the Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts:

_____x_____ Count I (Action for declaratory relief – liability against the NFL)

_____x_____ Count II (Medical Monitoring against the NFL)

_____x_____ Count IV (Fraudulent Concealment against the NFL)

_____x_____ Count V (Fraud against the NFL)

_____x_____ Count VI (Negligent misrepresentation against the NFL)

_____x_____ Count X (Negligence post 1994 against the NFL)

_____x_____ Count XI (Loss of Consortium against the NFL)

_____x_____ Count XII (Negligent Hiring against the NFL)

_____x_____ Count XIII (Negligent Retention against the NFL)

_____x_____ Count XVIII (Civil Conspiracy/Fraudulent Concealment against the
NFL)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. For punitive and exemplary damages as applicable;
- C. For all applicable statutory damages of the state whose law will govern this action;
- D. For medical monitoring, whether denominated as damages or in the form of equitable relief;
- E. For an award of attorney's fees and costs;
- F. An award of prejudgment interest and costs of suit; and
- G. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Rule 38, Federal Rules of Civil Procedure, Plaintiffs hereby demand a trial by jury.

RESPECTFULLY SUBMITTED:

s/ Sol H. Weiss

Sol H. Weiss
ANAPOL SCHWARTZ
1710 Spruce Street Philadelphia PA, 19103
Phone (215) 735-1130
Fax (215) 735-2024
Sweiss@anapolschwartz.com

s/ Pete Strom

STROM LAW FIRM, LLC
J. Preston Strom, Jr. (#4354)
Bakari T. Sellers (#11099)
2110 N. Beltline Boulevard
Columbia SC, 29625
Phone (803) 252-4800
Fax (803) 252-4801
petestrom@stromlaw.com

Attorneys for the Plaintiffs